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April 20, 2026

Sachin Pavithran
Executive Director
U.S. Access Board
1331 F St NW, Suite 1000
Washington, DC 20004

RE: ATBCB-2026-0001

Dear Dr. Pavithran,

The American Association of People with Disabilities (AAPD) and the Muscular Dystrophy Association (MDA) appreciate the opportunity to comment on this advanced notice of proposed rulemaking (ANPRM) regarding accessibility standards for universal changing stations.

As the Board notes in the ANPRM, universal changing tables are used by people with a range of disabilities for assistance with toileting. The inclusion of more changing tables in airports will increase accessibility, promote dignity and privacy for travelers with disabilities, and ultimately make it more possible for people with disabilities to travel via plane.

Standards for Universal Changing Tables

The ANPRM asks whether the Board should adopt the existing industry standard for universal changing tables from the International Code Council (ICC), or develop its own standards drawing from the current Americans with Disabilities Act (ADA) and Architectural Barriers Act (ABA) standards. AAPD and MDA encourage the Access Board to incorporate the new standards by reference that are in development by the ICC working group that are scheduled to be released in 2027. The Access Board participated in the development of the current ICC standards, and the 2027 timeline allows sufficient time for the Board to adopt these standards into a notice of proposed rulemaking (NPRM).

AAPD and MDA appreciate the Board's desire to accommodate the widest range of individuals with disabilities who need to transfer onto and from universal changing tables. AAPD and MDA agree that the height surface should be continuously adjustable. The range of adjustability should consider a wide range of disabilities, ages, and body

sizes and take into account those who use mobility devices in a seated position as well as people who can stand with limited mobility.

AAPD and MDA agree that the Board should require that the universal changing table have a non-porous surface for sanitation purposes.

Standards for the Rooms in Which Universal Changing Tables are Located

In addition to the ICC requirements (soap dispenser, sink, hand towel dispenser, coat hook, waste receptacles, and signage), the Board should also require grab bars, wall mounted sinks with soap dispensers or leveraging no touch technology for dispensers, automatic paper towel dispensers with recessed waste receptacles, wall mounted coat or equipment hooks or flip-down shelf, and either a wall tilted or a full-length mirror. For sanitation purposes, AAPD and MDA also recommend that the Board require a floor drain. In fact, our recommendations are further bolstered by a recent publication, the [Inclusive Spaces Framework](#), by The Access Coalition.¹ The framework includes detailed recommendations for single-use and multi-use restrooms such as space for belongings, fixtures, reach, occupancy signals, mirrors, and door operation. These recommendations were developed with input from people with disabilities, families, caregivers, and older adults to make restrooms more inclusive and accessible for all people.

Furthermore, the size of the room or stall in which the universal changing table is located should be large enough to accommodate an individual with a disability, a power wheelchair or mobility device, up to two companions or personal care attendants to assist the individual with toileting activities, as well as a baby stroller, if necessary for families with small children. In addition to being big enough to accommodate the above, the room should have sufficient space and clearance to allow room for maneuvering from the wheelchair or mobility device to and from the changing table, toilet, and sink.

In addition to the requirement that the door to the room feature locks that can be operated with a closed fist or via touchless technology, AAPD and MDA recommend occupancy signage outside the space that indicates when the space is in use and a U- or L-shaped privacy curtain that can be pulled for an additional layer of privacy that allows a caregiver to maneuver while assisting someone with a wheelchair.

Finally, when determining the costs associated with the provision of a universal changing table, AAPD and MDA encourage the Board to also account for the benefits that such tables will provide to people with disabilities and their families due to increased economic and travel opportunities. The [lack of adequate facilities](#) has led

¹ The Access Coalition is a retail coalition working to create more inclusive and accessible spaces. For more information, please visit <https://www.aapd.com/inclusive-retail-spaces-coalition/>.

families to change their loved ones on unsanitary bathroom floors, or to avoid flying all together, leading to isolation from friends and family who live far away.

Thank you again for the opportunity to comment on the ANPRM. For more information contact Michael Lewis, AAPD's Vice President of Policy at mlewis@aapd.com.

Sincerely,

Handwritten signature of Michael Lewis in black ink.

Michael Lewis
Vice President of Policy
American Association of People with Disabilities

Handwritten signature of Paul Melmeyer in black ink.

Paul Melmeyer, MPP
EVP, Public Policy & Advocacy
Muscular Dystrophy Association